January 19, 1995

To: County Agricultural Commissioners

Subject: PESTICIDE ILLNESS INVESTIGATION

Best wishes for a happy and healthy year from the Worker Health and Safety staff. With your help, we have made progress in making illness data available promptly. We would like to take this opportunity to thank you for your efforts of the past year and to remind you that we depend on you for timely and informative investigations. Case assignments for 1996 will start immediately. Please try to clean up 1995 cases as soon as possible.

In an attempt to increase efficiency, we have been sending letters to individual doctors to remind them of the reporting requirement. This seems to be more effective than anything else we have tried. The declining trend in number of PIRs reversed in 1995. We hope this gives you the opportunity to locate the people involved before they move or forget what happened.

Leon Spaugy of Los Angeles County has suggested that the letters to doctors specify that the investigators will be staff of the agricultural commissioner and that the letters provide the commissioner's telephone number. Recent letters incorporate the first suggestion. We solicit your comments on the helpfulness of putting your telephone numbers into the letters. If we do that, and if the doctor lives in a county other than the one investigating the episode, which number should we use?

With this letter, you will find a copy of a letter we are sending to all the local health officers. Thank you again for your work to keep pesticide use safe and to identify the problems when it fails to be safe.

Sincerely,

## [Original signed by John M. Donahue]

John M. Donahue, Branch Chief Worker Health and Safety Branch (916) 445-4222

Attachment cc: Daniel J. Merkley

1020 N Street, Room 200 Sacramento, CA 95814-5624

January 17, 1996

FIELD(005)
FIELD(010) Health Officer
FIELD(007)
FIELD(008)
FIELD(009?)

Dear FIELD(006)

At the fall meeting of the California Conference of Local Health Officers (November 17, 1995 in Lake Tahoe), you may have participated in a discussion with John Donahue, chief of the Worker Health and Safety Branch of the California Department of Pesticide Regulation. He spoke primarily about our surveillance program for health conditions that result from pesticide exposure and our efforts to improve physician familiarity and cooperation with this program. Our goal is prompt reporting of any case in which a doctor suspects pesticide involvement.

The legal definition of pesticide has been a major source of misunderstanding. With this letter, you will find copies of sections from the California Food and Agricultural code. Sections 12753 and 12754.5 define "economic poison" very broadly, including any sort of preparation (apart from pharmaceuticals) intended to control any sort of deleterious organism, including pathogens. Consequently, sanitizers and disinfectants are "economic poisons". Sections 11404, 12503, and 14021 establish that "pesticide" is a synonym for "economic poison". I also include a copy of Health and Safety Code Section 2950, which mandates reporting.

Several doctors have asked for lists of all pesticides. Unfortunately, we cannot provide such lists. Not only would they become obsolete rapidly, they could not be exact even initially. Categorization as a pesticide depends upon the intent of the user more than on any inherent characteristics of the substance. Many products (household bleach is the most common example) have both pesticidal and non-pesticidal uses.

We greatly appreciate your efforts to remind physicians in your jurisdiction of their responsibility for reporting. Reports from physicians provide a major source of information on pesticide hazards and guide the Department of Pesticide Regulation in mitigating risks.

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I would also like to take this opportunity to verify the telephone numbers to which doctors may report pesticide illnesses in compliance with Health and Safety Code Section 2950. For FIELD(010), we list FIELD(002) as the voice line and FIELD(003) for fax transmission. Please let me know if I need to update these numbers. The form on which such reports are recorded (Pesticide Illness Report, form OEH-PETS 003) is available from the Office of Environmental Health Hazard Assessment at (510) 540-3063. This form lists on its reverse the offices that are to receive copies.

Thank you for your help.

Sincerely,

Louise N. Mehler, M.D.
Program Director
Pesticide Illness Surveillance Program
Worker Health and Safety Branch
(916) 445-4190

Enclosures